

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA, ) **INFORMATION** CR 11-22 Jne  
 )  
Plaintiff, ) (18 U.S.C. § 1343)  
 )  
v. )  
 )  
DENNIS LEE PAP, )  
 )  
Defendant. )

THE UNITED STATES ATTORNEY CHARGES:

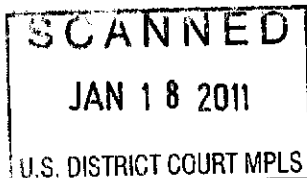
INTRODUCTION

At all times relevant to this Information:

1. Access Insurance Association ("Access") was a Minnesota-based self-insured workers' compensation association, formed to provide workers' compensation insurance coverage to agricultural businesses located in Minnesota.

2. Pillar Insurance Limited ("Pillar") was a reinsurance company, formed in the Cayman Islands to provide liability and property insurance coverage to agricultural businesses located in Minnesota.

3. Parthenon Risk Partners LLC ("Parthenon") was an organization formed in or about 2004 to provide a United States office for Pillar. Parthenon provided certain services to both Pillar and Access, including the handling of premium contributions from agricultural businesses and return of surplus premiums to agricultural businesses.



**FILED** JAN 18 2011  
RICHARD D. SLETTEN  
JUDGMENT ENTD \_\_\_\_\_  
DEPUTY CLERK \_\_\_\_\_

United States v. Dennis Lee Pap

4. Dennis Lee PAP was the CEO and sole LLC member of Parthenon. In that capacity, PAP had access to, and signing authority for, certain financial institution accounts of Access, Pillar, and Parthenon.

**COUNT 1**  
**(Wire Fraud)**

5. From at least in or about July 2008 and continuing until in or about December 2009, in the State and District of Minnesota and elsewhere, the defendant,

**DENNIS LEE PAP,**

did knowingly and intentionally devise and execute a scheme and artifice to defraud Access and Pillar, and to obtain money and property from them by means of false and fraudulent pretenses, representations, and promises.

6. From at least in or about July 2008 and continuing until in or about December 2009, PAP illegally took approximately \$1.8 million, held in accounts for the benefit of Access and Pillar for insurance purposes, and diverted the funds to his own personal use.

7. During the time period when PAP was illegally diverting funds, he concealed his actions from Pillar and Access board members, and made misrepresentations to them concerning the financial condition of Access and Pillar.

United States v. Dennis Lee Pap

8. On or about September 2, 2008, in the State and District of Minnesota and elsewhere, the defendant,

**DENNIS LEE PAP,**

for the purpose of executing the above-described scheme and artifice to defraud, did knowingly transmit and cause to be transmitted in interstate commerce, by means of a wire communication, certain signs and signals, that is, an online Internet transfer of \$205,000 from the bank account of Parthenon Risk Partners LLC at Wells Fargo Bank to a personal bank account over which he had control at Wells Fargo Bank.

9. All in violation of Title 18, United States Code, Section 1343.

**Forfeiture Allegations**

10. Count 1 of this Information is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

11. As the result of the offense alleged in Count 1 of this Information, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds

United States v. Dennis Lee Pap

traceable to the violations of Title 18, United States Code, Section 1343.

12. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

13. All in violation of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Dated: *Jan 18, 2011*

JOHN R. MARTI  
First Assistant U.S. Attorney  
Attorney for the United States  
Acting Under Authority Conferred  
By 28 U.S.C. § 515

*William J. Otteson*

BY: WILLIAM J. OTTESON  
Assistant U.S. Attorney